

February 4, 2006

From:

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To the Commission in the matter of RM-11305

My name is Roy Lincoln. I have been a licensee of the Commission for 44 years, holding the Amateur Extra Class license since 1977. I also hold presently the General Radiotelephone License and have held the 2nd Class and First Class versions in the past and I have been employed as a Land Mobile radio technician for 33 years.

The amateur bands are shared by a widely diverse group of people who live in circumstances ranging from large rural acreages to small city lots and/or apartments. In one case they may have huge and magnificent antenna arrays and no impediment to using the full legal power limit of 1500 watts while their counterparts in the city often employ much less than optimum antennas and resort to use of lower power levels in an effort to maintain harmony with neighbors and avoid interference to consumer electronics equipment. Significant and growing numbers of us live in neighborhoods where restrictions exist forbidding any outside antennas and must resort to clandestine, hidden and/or disguised antennas. The efficiency of these antennas is often seriously impaired and we frequently resort to the use of the narrower bandwidth modes because of their higher performance levels (as contrasted with wide bandwidth modes). There is a significant and growing movement today (called the QRP movement) towards the use of less and less power clear down into the milliwatt and microwatt range. Results realized using such low power levels requires us to be able to detect the very weakest signals. High power wideband modes operating in the same frequency range as QRP stations render their operations impaired to useless by raising the noise floor, necessitating all to raise their power to communicate. Thus wideband signals operating in the same area of the spectrum with narrow would dominate and seriously impair the narrow mode capabilities because the state of the art permits

the narrow mode signals to be removed or "notched out" of the wideband mode but the converse is not possible. There is a movement in the digital community to want to employ greater bandwidth than is even legal today under existing rules in the HF spectrum. Thinking and talk suggests that 25-200 khz. might be appropriate. Because of ionospheric propagation and fading, wideband digital signals require rapidly increasing bandwidth to sustain disproportionately smaller increases in throughput speed, thus the situation tends quickly toward inefficient spectrum use when considering how many amateurs are completely displaced in the process. Then there are the digital robots whose owners and users want the ability for them to roam freely in the spectrum so as to increase their desire for speed and throughput despite the fact that their numbers constitute less than 1% of amateurs. Some believe that, with pretty convincing evidence, WINLINK 2000 is already operating illegally in bandwidth and that they would be an even bigger and more serious disruptive influence in the HF spectrum if they were allowed to roam free.

Compounding the situation still further, RM-11305 would remove bandwidth restrictions existing now and there would be nothing to prevent FM use on HF. The Commission has always wisely limited FM to 29 Mhz. and higher.

By "gentlemens agreement" the 160 meter amateur band (1.800-2.000 Mhz) is often pointed to as a model of amateur cooperation and harmony. The agreement is that the narrow modes will remain below 1.840 Mhz. and the wide modes will remain above 1.843 Mhz. since the majority of such operation is ssb employing the lower side band. This does work pretty well in a sense but several times a year the narrow mode segment is rendered useless when wideband modes invade the under 1.840 Mhz. range, during contests. When the contests involve the narrow modes and sheer useage requires them to move into the higher subband, it rarely if ever reaches 1.900 Mhz. The wideband modes go right on operating in the 1.850 Mhz. range and up despite the invasion of the narrow modes and the narrow modes have to accept that their results will be diminished in that area accordingly. This despite the fact that much of the over 1.900 Mhz. range goes unused in the wideband events. This situation clearly shows that 160 meters is a good but subtle example of the degree to which the bands would be dominated by the wider modes to the detriment of the narrow modes. 160 meters has proven to be a less than sterling example because there are those of us who seem to maintain that we weren't party to "gentlemens agreements" and will only be bound by

limitations placed on us by Commission rules. Mode or bandwidth partitioning is the only way to allocate spectrum that will serve all fairly and efficiently.

Many of us are disappointed with the group that sponsored this rule making petition. While using lofty sounding language and purporting to represent the amateur community's highest aspirations, they represent instead the views of a tiny segment of amateur radio and seek to propagate wide bandwidth modes everywhere in the available spectrum. We feel that the entire subject should have been well thought out and a broad consensus in the amateur community should have been developed before such a request, should have reflected the needs of the entire community and should have respected the time, responsibilities and limited resources of the Commission. While not perfect, the RM-11306 proposal from the American Radio Relay League is a much better proposal and was better thought out. With modification it could be a good proposal.

Under our existing system of regulation, we have incentive to employ lower power levels and the more efficient narrow bandwidth modes and sufficient spectrum availability to accommodate increasing numbers of users. Our future ought to be in the direction of encouraging lower power usage and lower user bandwidth consumption, not encouraging the increasing use of wider bandwidth modes that are more particularly suited to commercial broadcasting applications.

Many replies to RM-11305 simply state that the writer is "opposed". I believe these factors are quite apparent to many and that they sense the ramifications of this proposal but found it very difficult to respond effectively.

I beg the Commission to reject RM-11305 in its entirety and to consider RM-11306, with modification, as a serious alternative that may be worthy of consideration. If even that would fail to respect the Commission's viewpoint and workload sufficiently, then I would request that you also reject RM-11306 and tell the ARRL to rethink and rework the plan and bring it back with broad support from the entire amateur community.

Thank you for considering my views.

Respectfully submitted,

Roy Lincoln WA4DOU